

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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CHRISTY J. MATHIS and  
PAUL J. MATHIS,

Plaintiffs,

Case No. 22-cv-47-JDP

vs.

BRIAN BRZEZINSKI,  
JULIE BRZEZINSKI,  
and a minor child, A.B.

Defendants.

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AFFIDAVIT IN SUPPORT OF  
MOTION FOR ENTRY OF DEFAULT JUDGMENT

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I, Paul M. Secunda, being duly sworn, state as follows:

1. I am the attorney for the Plaintiffs in the above-entitled action and I am familiar with the file, records and pleadings in this matter.
2. The summons and amended complaint were served upon the Defendants on July 15, 2022.
3. An answer to the amended complaint was due on August 5, 2022. No response was served within the time allowed by law nor have the Defendants sought additional time within which to respond.
4. The default of Defendants was entered on September 29, 2022.
5. The Court held an evidentiary hearing on Plaintiffs' motion for default judgment on September 19, 2023, and the Court granted Plaintiff's motion against Defendants A.B., Julie Brzezinski, and Brian Brzezinski and awarded \$25,000 in compensatory damages against A.B., \$15,000 in punitive damages against A.B., and \$5,000 in statutory damages against Julie and Brian Brzezinski under Wis. Stat. § 895.035.
6. The Court held open judgment until Plaintiffs satisfied the Servicemembers Civil Relief Act, 50 U.S.C. § 3931(b)(1).

7. As required by the Servicemembers Civil Relief Act of 2003, 50 U.S.C. § 3931(b)(1), I have confirmed that neither Defendants Brian Brzezinski nor Julie Brzezinski are currently in active military service, according to the Department of Defense Manpower Data Center.

8. I have attached the Status Reports from the Manpower Date Center for each of the Defendants in support of the fact that neither are currently in active military service.

Paul M. Oll

Paul M. Secunda  
Attorney for Plaintiffs

Sworn to and subscribed before me this 20<sup>th</sup>  
day of SEPTEMBER 2023.

Notary Public  
My Commission Expires: \_\_\_\_\_





**Status Report  
Pursuant to Servicemembers Civil Relief Act**

SSN:

Birth Date: Jan-XX-1976  
 Last Name: BRZEZINSKI  
 First Name: BRIAN  
 Middle Name: J  
 Status As Of: Sep-19-2023  
 Certificate ID: 8R5ZWGFQ8WS2S3H

## On Active Duty On Active Duty Status Date

Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA

This response reflects the individuals' active duty status based on the Active Duty Status Date

## Left Active Duty Within 367 Days of Active Duty Status Date

Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA

This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date

## The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date

Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA

This response reflects whether the individual or his/her unit has received early notification to report for active duty

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, Space Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty. **HOWEVER, WITHOUT A SOCIAL SECURITY NUMBER, THE DEPARTMENT OF DEFENSE MANPOWER DATA CENTER CANNOT AUTHORITATIVELY ASSERT THAT THIS IS THE SAME INDIVIDUAL THAT YOUR QUERY REFERS TO. NAME AND DATE OF BIRTH ALONE DO NOT UNIQUELY IDENTIFY AN INDIVIDUAL.**

*Sam Yousefzadeh*

Sam Yousefzadeh, Director

Department of Defense - Manpower Data Center  
 4800 Mark Center Drive, Suite 04E25  
 Alexandria, VA 22350



**Status Report**  
**Pursuant to Servicemembers Civil Relief Act**

SSN:

Birth Date: Oct-XX-1977  
 Last Name: BRZEZINSKI  
 First Name: JULIE  
 Middle Name: R  
 Status As Of: Sep-19-2023  
 Certificate ID: GD02PL05Z6YY505

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals' active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, Space Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty. **HOWEVER, WITHOUT A SOCIAL SECURITY NUMBER, THE DEPARTMENT OF DEFENSE MANPOWER DATA CENTER CANNOT AUTHORITATIVELY ASSERT THAT THIS IS THE SAME INDIVIDUAL THAT YOUR QUERY REFERS TO. NAME AND DATE OF BIRTH ALONE DO NOT UNIQUELY IDENTIFY AN INDIVIDUAL.**

*Sam Yousefzadeh*

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